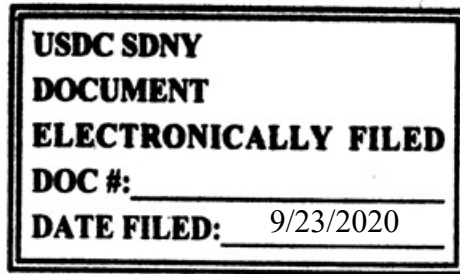




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September 22, 2020

**VIA ECF**

The Honorable Stewart D. Aaron, U.S.M.J.  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street – Courtroom 11C  
New York, NY 10007

**Re: *Shukla v. Deloitte Consulting LLP***  
**Civil Action No. 1:19-cv-10578 (AJN) (SDA)**

Dear Judge Aaron:

This Firm represents defendant Deloitte Consulting LLP (“defendant”) in the above-referenced matter. We write to request an extension of two additional days for the parties to submit letters addressing the outstanding discovery disputes in this matter as set forth in the Court’s Order dated September 7, 2020 (the “Order”) (ECF No. 72). Currently, defendant’s submission is due Monday, September 28, and plaintiff’s response is due October 5. The Court scheduled a telephone conference to address the outstanding discovery issues on October 13 (ECF No. 73).

Pursuant to the Court’s Order, Your Honor directed the parties to meet and confer to resolve any outstanding discovery disputes prior to the October 13 telephone conference. In a letter to plaintiff dated September 10, defense counsel suggested the parties schedule a call for September 16 or 17 to provide sufficient time for the parties to discuss the issues and meet the Court’s deadline for submissions. In response, plaintiff advised that he was available early this week. Counsel scheduled the call with plaintiff for Tuesday, September 22 at 10 a.m. Just prior to the call this morning, plaintiff requested that we adjourn the call to another day. Defense counsel agreed but, due to other commitments on Wednesday, September 23 and early Thursday, asked plaintiff to reschedule the call for the afternoon of Thursday, September 24, and to consent to an extension of the deadlines for the upcoming submissions. As of this filing, we have not received a response from plaintiff regarding rescheduling the call or the extension request.

Defendant’s submission is presently due September 28. Because September 28 is a religious holiday, defendant intended to file its submission on Friday, September 25. Moving the parties’ “meet and confer” call to, the earliest, Thursday September 24, does not provide defense counsel sufficient time to consult with its client and finalize its submission by Friday.



The Honorable Stewart D. Aaron, U.S.M.J.  
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Accordingly, defendant respectfully requests the Court grant defendant two additional days to submit its letter, moving the deadline from September 28 to September 30. Defense counsel consents to a corresponding adjournment of plaintiff's deadline by two days from October 5 to October 7.

We thank Your Honor for consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Tabakman'.

Gregory S. Tabakman

cc: Ashu Shukla, plaintiff *pro se* (via ECF)

Request GRANTED on consent. SO ORDERED.  
Dated: 9/23/2020

A handwritten signature in blue ink, appearing to read 'Stewart D. Aaron'.